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June 29, 2020

VIA ECF

The Honorable Gabriel W. Gorenstein
Chief U.S. Magistrate Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

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Re: *Donna Wood et al. v. Mike Bloomberg 2020, Inc.*, No. 20 Civ. 2489 (LTS) (GWG)

Dear Judge Gorenstein:

We represent Defendant Mike Bloomberg 2020, Inc. (the “Campaign”) in the above-referenced action. In accordance with the Court’s Individual Practices, the Campaign respectfully requests an adjournment of the Initial Case Management Conference (“ICMC”) currently scheduled for July 6, 2020, with a corresponding adjournment of the parties’ obligations to file a proposed scheduling order, so that the parties can attempt to reach agreement on a phased discovery schedule as directed in this Court’s Order issued earlier today (Dkt. 119). We sent an email to Plaintiffs’ counsel this afternoon to request that Plaintiffs agree to the Campaign’s request and proposed several dates in July for their consideration, but have not yet heard back from Plaintiffs’ counsel. Accordingly, we are sending this letter today in light of paragraph 1.F of the Court’s Individual Practices and our call to the Court today in accordance with that paragraph to determine an alternative date for a rescheduled court appearance, to inform the Court that we will continue to attempt to reach agreement with Plaintiffs’ counsel regarding an adjournment of the ICMC so that the parties can propose mutually available dates to the Court.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ *Elise M. Bloom*

Elise M. Bloom

cc: All Counsel of Record (via ECF)